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9 Attorneys for Defendant
JASON EDWARD THOMAS CARDIFF
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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 JASON EDWARD THOMAS
18 CARDIFF,

19 Defendant.
20
21

Case No. 5:23-cr-00021-JGB

**JASON CARDIFF'S
SUPPLEMENTAL REPLY IN
SUPPORT OF JASON CARDIFF'S
MOTION TO EXTEND
INTERNATIONAL TRAVEL AND
GOVERNMENT'S STATUS
REPORT**

**JASON CARDIFF'S STATUS REPORT OR RESPONSE TO
GOVERNMENT'S STATUS REPORT**

The Government's Status Report is actually a response to Defendant's clarification to the Court that, under the Order (Dkt. 123), Mr. Cardiff is set to return to the United States on November 20, 2024.¹

The Government ignores the fact that Mr. Cardiff was referred by his cardiologist, Dr. Hazel Byrne, to get medical testing.

More to the point, the Government points out that Dr. Stafford is a Ob-Gyn physician but fails to mention that she is also certified as a member of the Royal College of General Practitioners and is more than qualified to refer Mr. Cardiff to the Spirometry Clinic, which addresses lung function. The deliberate failure to point out the complete qualifications of the physicians appears to be a calculated half-truth.

Counsel is not a doctor, but understands that people with cardiology problems often have problems with lung function at the same time. Counsel has represented, as an officer of the Court, that counsel has reviewed medical records supporting the representations made to the Court.

Ultimately, this is about Mr. Cardiff's health and safety when it comes to travel. Given Mr. Cardiff's scrupulous compliance with pretrial conditions, it is respectfully submitted that the Court should be allowed to get needed medical testing and treatment grant the request to assure that Mr. Cardiff does not sustain a serious health problem on his return to the United States.² Counsel will file an appropriate motion

¹ There is no option in CM/ECF to file a response to the Government's Status Report. In an effort to comply with ECF/CM filing options, counsel submits this supplemental response to the Government's Opposition to Defendant's Motion to Extend International Travel.

² On one hand, the Government insisted on electronic monitoring, but on the other hand, did not know that electronic monitoring does not work overseas. Regardless, Mr. Cardiff fully intends to return to defend this case.

1 to seal of the medical records at issue to eliminate all doubt that qualified physicians
2 have reached an opinion that Mr. Cardiff is “unfit to fly” and will do later this
3 afternoon.³

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5 Dated: November 18, 2024

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7 By: /s/ Stephen R. Cochell

8 Stephen R. Cochell

9 Attorney for Defendant

10 JASON EDWARD THOMAS CARDIFF

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12 **SERVICE LIST**

13 I HEREBY DECLARE THAT THE FOLLOWING COUNSEL HAVE BEEN
14 SERVED WITH THIS DEFENDANT JASON CARDIFF’S NOTICE OF MOTIO
15 AND MOTION TO SUPPRESS EVIDENCE THROUGH THE COURT’S ECF O
16 NEXT GEN ELECTRONIC FILING SYSTEM:

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3 Counsel also notes that bond was posted by Lilia Murphy in the amount of
\$500,000 with her home as collateral.

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